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Attorney for Defendant

Anthony Holley

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**ERRICA JAMES INDIVIDUALLY AND ON
BEHALF OF HER MINOR DAUGHTER S.C.**

Plaintiff(s),

Case No. 3:24-CV-10894-RK-JBD

v.

DEFENDANT HOLLEY ANSWER

**BOARD OF EDUCATION OF THE
FRANKLIN TOWNSHIP PUBLIC
SCHOOLS; JOHN RAVALLY; NICHOLAS
SOLOMON; ROD BRUNDIGE; ORVYL
WILSON; ANTHONY HOLLEY; MAKAI
HOWARD; John Docs 1-50; Jane Does 1-50**

Defendant(s).

ANSWER

Defendant Anthony Holley ("Defendant") hereby answers Plaintiff's Errica James on behalf of herself and her minor daughter S.C. ("Plaintiff") Complaint as follows:

NATURE OF THE ACTION

1. In response to paragraph 1 of the Complaint, Defendant admits that it is an action for damages under 42 U.S.C. 1983; damages and injunctive relief under Title IX of the Civil Rights Act, 20 U.S.C. §1681; and pendant state law claims.
2. This court has jurisdiction pursuant to 28 U.S.C. §1331, granting the court jurisdiction over civil actions arising out of the laws of the United States.
3. This Court also has jurisdiction over related state law claims pursuant to 28. U.S.C. § 1367.
4. Venue is properly laid in the District of New Jersey, pursuant to 28 U.S.C. § 1391(b)(1) as Defendants reside in this district.

THE PARTIES

5. Defendant admits the allegations in paragraph 5 of the Complaint.
6. Defendant admits the allegations in paragraph 6 of the Complaint.
7. The Defendant admits Defendant John Ravally ("Ravally") is the Superintendent of the Franklin Township School District. The Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations contained in paragraph 7.
8. The Defendant admits Defendant Nicholas Solomon ("Solomon") is the principal of Franklin High School. The Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations contained in paragraph 8.
9. The Defendant admits Defendant Rod Brundige ("Brundige") is the vice principal of Franklin High School. The Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations contained in paragraph 9.
10. The Defendant admits Orvyl Wilson ("Wilson" and together with the Board, Ravally, Solomon and Brundige, collectively, the "District Defendants") is the Director of School Management and Student Advocacy for the Franklin School District. The Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations contained in paragraph 10.
11. The Defendant admits he is a 16-year-old student at Franklin High School. The Defendant denies the remaining allegations contained in paragraph 11.

12. The Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 12 of the Complaint.
13. The Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 13 of the Complaint.

FACTUAL BACKGROUND

14. The Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 14 of the Complaint.
15. The Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 15 of the Complaint.
16. The Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 16 of the Complaint.
17. The Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 17 of the Complaint.
18. The Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 18 of the Complaint.
19. The Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 19 of the Complaint.
20. The Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 20 of the Complaint.
21. The Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 21 of the Complaint.
22. The Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 22 of the Complaint.
23. The Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 23 of the Complaint.
24. The Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 24 of the Complaint.

- 25. The Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph(s) 25-45 of the Complaint.
- 26. The Defendant denies the allegations in paragraph 46 of the Complaint.
- 27. The Defendant denies the allegations in paragraph 47 of the Complaint.
- 28. The Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph(s) 48-64 of the Complaint.
- 29. Defendant denies all other allegations related to rape or inappropriate behavior and lacks sufficient information to admit or deny other specifics regarding other Defendants' responsibilities.

COUNT ONE (TITLE IX AGAINST THE BOARD)

- 30. Defendant denies all allegations and lacks sufficient information to admit or deny other specifics regarding other named Defendants' responsibilities.

COUNT TWO (LAW AGAINST DISCRIMINATION)

- 31. Defendant denies all allegations and lacks sufficient information to admit or deny other specifics regarding other named Defendants' responsibilities.

COUNT THREE (NEGLIGENCE CLAIMS AGAINST BOARD DEFENDANTS)

- 32. Defendant denies all allegations related to rape or inappropriate behavior and lacks sufficient information to admit or deny other specifics regarding other Defendants' responsibilities.

COUNT FIVE (BATTERY)

- 33. Defendant denies all allegations and lacks sufficient information to admit or deny other specifics regarding other named Defendants' responsibilities.

COUNT SIX (CLAIM OF JAMES FOR TORT AGAINST MINOR CHILD)

- 34. Defendant denies all allegations and lacks sufficient information to admit or deny other specifics regarding other named Defendants' responsibilities.

COUNT SEVEN (INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)

35. Defendant denies all allegations and lacks sufficient information to admit or deny other specifics regarding other named Defendants' responsibilities.

PRAYER FOR RELIEF

WHEREFORE, Defendant prays for the following relief:

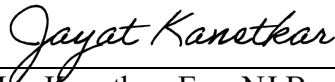
1. That the Complaint against Defendant, Anthony Holley, Jr., be dismissed with prejudice;
2. That judgment be entered in favor of Defendant on all claims and against Plaintiff;
3. That Defendant, Anthony Holley, Jr., be awarded attorneys' fees and costs; and
4. For such other and further relief as this Court may deem proper.

DEMAND FOR TRIAL BY JURY

Defendant demands a trial by jury on all issues that are so triable.

Dated: July 15, 2025

Respectfully submitted,



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